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August 14, 2012



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Via Federal Express

United States Environmental Protection Agency - East
Attn: TSCA Section 8(e)
Room 6428
1201 Constitution Avenue, NW
Washington, DC 20004

Subject: Notice in Accordance with TSCA Section 8(e): Results of a Bovine Corneal Opacity and Permeability Test (BCOP Test) with Ethylmethyylimidazolium Benzoat (CAS No. 150999-33-0)

Dear Section 8(e) Coordinator:

BASF Corporation is submitting results of a Bovine Corneal Opacity and Permeability Test (BCOP Test) according to OECD test guideline 437 (adopted 7th September 2009) with Ethylmethyylimidazolium Benzoat (CAS No. 150999-33-0), conducted by BASF SE, Ludwigshafen, Germany. The test substance is used as a catalyst for polyurethane reactions in coatings formulations and adhesives.

Summary

The potential of Ethylmethyylimidazolium Benzoat to cause serious damage to the eyes was assessed by a single topical application of 750 µL of the undiluted test-substance to the epithelial surface of three isolated bovine corneas.

Three corneas were treated with the test substance for an exposure period of 10 minutes followed by a 2-hours post-incubation period. Based on changes in corneal opacity and permeability (relative to the control corneas), an *In Vitro* Irritancy Score was determined.

Corneal opacity was measured quantitatively as the amount of light transmission through the cornea. Permeability was measured quantitatively as the amount of sodium fluorescein dye that passes across the full thickness of the cornea. Both measurements were used to calculate an *In Vitro* Irritancy Score of the test substance.



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The BCOP test showed the following results:

Test substance	Mean Opacity Value	Mean Permeability Value	In Vitro Irritancy Score
12/0365-1	38.0	2.198	71.0
NC	1.5	-0.003	1.5
PC	138.2	3.408	189.3

Based on the observed results and applying the evaluation criteria, the data indicate that Ethylmethylimidazolium Benzoate causes serious eye damage in the Bovine Corneal Opacity and Permeability Test (BCOP Test) under the test conditions chosen.

Existing guidance for this in vitro test is not sufficient to determine whether this information is reportable under TSCA Section 8(e); therefore, no determination has been made as to whether a significant risk of injury to health or the environment is actually presented by the findings.

BASF Corporation understands that reporting of the results from this study under TSCA 8(e) is in accordance with EPA's policy.

If you have any questions, please contact the undersigned at (973) 245-6693.

Sincerely,

Janet Cerra

Janet Cerra
Product Regulatory Center of Expertise
North America

/

1374th Letter.doc

From: (973) 245-6693
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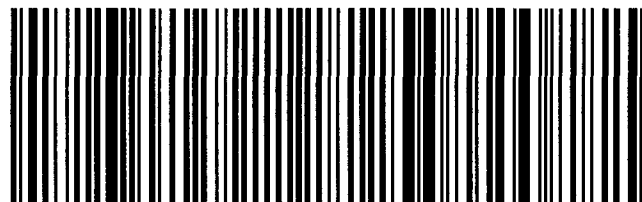
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